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**From:** PARRETT Kevin  
**Sent:** Wed 12/16/2015 10:02:27 PM  
**Subject:** Operable Units for Portland Harbor Proposed Plan  
Proposed Operable Units & Lead Performing Parties - 12-16-15.pptx

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Hi Cami,

I am following up on our conversation last week about DEQ's request for operable units to be specified in the Portland Harbor Proposed Plan. Attached is an initial cut at delineation of these OUs and identification of the most likely primary (lead) liable party for implementing the remedy within each OU.

The proposed OUs are based on EPA's Optimized Alternative that was presented to the NRRB/CSTAG. The attached figure shows 13 area-specific OUs plus an OU for the remainder of the site. The area-specific OUs address nearly all areas requiring active remediation and nearly all of these OUs have an obvious lead liable party.

You have expressed concern about specifying OUs in the Proposed Plan. And, I've expressed concern about not doing so. In order to resolve this impasse, I propose the following path forward:

∇ By Dec 31 – Gary V and Lori C talk to develop list of pros and cons.

∇ Early Jan – You and I brief Dick/Dennis/Jim on DEQ's proposal and pros/cons.

∇ Jan 21 – Bill Ross facilitate discussion at DEQ/EPA project team meeting (Gary and Lori attend).

∇ By Jan 29 – You and I, in consultation with Gary and Lori, refine agencies positions and pros/cons.

∇ Early Feb – Bill Ross facilitate your and my recommendations to Dick/Dennis/Jim.

∇ By Feb 29 – If necessary, Dick submits formal written request to Dennis.

Also, at some point in this process, Gary and Lori should follow up with the LWG (probably Patty Dost) on the LWG's recommendation to the NRRB that the site be broken into OUs in order to facilitate the administrative implementability of the remedy.

Let me know what you think about this path forward. I'm available Friday if you'd like to talk.

Thanks.

Kevin Parrett, Manager

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